

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY  
CAMDEN VICINAGE**

IN RE: VALSARTAN, LOSARTAN, AND  
IRBESARTAN PRODUCTS LIABILITY  
LITIGATION

Hon. Robert. B. Kugler

This Document Relates To:  
*All Actions*

Civ. No. 19-2875 (RBK/JS)

**PLAINTIFFS' SECOND AMENDED NOTICE OF VIDEOTAPED  
DEPOSITION OF SUSHIL JAISWAL**

TO: **Alexis Brancato**  
**Kirkland & Ellis, LLP**  
**601 Lexington Avenue**  
**New York, NY 10022**

*Counsel for Defendants Torrent Pharmaceuticals LTD and Torrent Pharma Inc.*

PLEASE TAKE NOTICE that, pursuant to Fed. R. Civ. P. 30, Plaintiffs will take the videotaped deposition of Sushil Jaiswal, Executive Director – Quality & Regulatory. The deposition will commence on **Friday June 25, 2021, at 9:00 a.m. Eastern Standard Time**, and continue until completion, at Kirkland & Ellis, LLP, 601 Lexington Ave. New York, NY 10022, via zoom, in accordance with the Fact Witness Deposition Protocol, Case Management Order #20, filed November 17, 2020 (Document 632).

The witness shall produce the documents requested at Exhibit A, attached hereto, at least 5 days in advance of the deposition.

Pursuant to the meet and confer between the parties, a translator will not be provided.

**TAKING ATTORNEYS FOR PLAINTIFFS:**

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The deposition will be taken before an officer authorized to administer oaths. Testimony given during the deposition will be recorded by sound video recording and stenographic means.

DATED this 18<sup>th</sup> day of May, 2021.

**BARTON AND BURROWS, LLC**

By: /s/ Stacy A. Burrows  
Stacy A. Burrows  
5201 Johnson Dr., Ste. 110  
Mission, KS 66205  
Phone (913) 563-6253

*Attorneys for Plaintiffs*

**EXHIBIT A**

**DOCUMENT REQUESTS**

1. The most recent resume/Curriculum Vitae and LinkedIn profile for Sushil Jaiswal.
2. The complete production of Sushil Jaiswal's relevant custodial documents, including those maintained on personal computers or electronic devices, to the extent not produced prior.

**CERTIFICATE OF SERVICE**

I, Stacy Burrows, hereby certify that on May 18<sup>th</sup>, 2021, I caused true and correct copies of the foregoing to be transmitted via ECF to all counsel having registered an appearance on ECF, with courtesy copies served on counsel for Torrent Pharmaceuticals Limited and Torrent Pharma Inc., and Defendants' liaison counsel, via email.

DATED this 18<sup>th</sup> day of May, 2021.

**BARTON AND BURROWS, LLC**

By: /s/ Stacy A. Burrows  
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***Attorneys for Plaintiffs***